INSURANCE INSTITUTE
FOR HIGHWAY SAFETY

March 5, 2003

The Honorable Jeffrey W. Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Request for Comments on U.S.
Draft Proposal for a Global Technical Regulation

Dear Dr. Runge:

The National Highway Traffic Safety Administration (NHTSA) has requested comments on its draft proposal for a Global Technical Regulation (GTR) on door locks and door retention components. The Insurance Institute for Highway Safety (Institute) supports the draft proposal as a long overdue step toward making door locks and retention components more crashworthy. In 1990, the Institute petitioned NHTSA to improve the existing U.S. FMVSS 206 by adopting the types of changes proposed in the draft GTR. The GTR includes one of the crucial improvements sought in the Institute's petition — new test procedures that simulate the complex loading on door latches, which occurs in severe crashes. However, the Institute believes the requirements of the GTR should cover latches on all doors on a vehicle, including hatchback, tailgate, and other rear doors, and not just side doors.

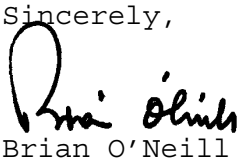
In its 1990 petition, the Institute pointed out that the existing federal standard on door locks is inadequate because it only tests the strength of the individual components under transverse and longitudinal loading. In addition, the existing standards only test the individual components in a laboratory test fixture and do not test those components as they are mounted in the vehicle. The Institute sought these changes because loading of any door latch system in a crash is much more complex than the two directions of loading now required in the existing standard. There is seldom, if ever, only a transverse load or only a longitudinal load applied to the latch assembly in a collision of sufficient severity to result in a towaway crash. Loading is generally a combination of longitudinal, transverse, and other forces. This complex loading, which is not represented in the

requirements of FMVSS 206, should be reflected in the GTR. The existing federal standard also is critically flawed because it only specifies the loading for latch and hinge hardware and does not test the strength of components as they are mounted in the vehicle. The effectiveness of strong latches can be undercut by a weak door or vehicle structure, which fails when the lock is exposed to stress. The GTR should include tests that would reproduce this more complex loading with the latch assembly mounted in the structure in which it will be used (door and B- or C- pillar).

In our 1990 petition, we urged the agency to apply the requirements of FMVSS 206 to all door latches in the vehicle. As part of the proposed GTR rulemaking, NHTSA prepared a table comparing FMVSS 206 and ECE R11. Although NHTSA amended FMVSS 206 in 1995 to include back doors in all light passenger vehicles, ECE R11 applies only to side doors. The Institute recommends that the GTR include hatchback, tailgate, or other rear doors as well as side doors.

In summary, the Institute supports NHTSA's draft proposal for the GTR. The agency should move quickly to adopt new requirements addressing the strength of door latches, as they are mounted on the vehicle, under the complex loadings found in real-world crashes. These requirements also should apply to all doors in light passenger vehicles.

Sincerely,



Brian O'Neill
President